

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Older Americans Act (OAA), P.L. 89-73, enacted July 14, 1965, last amended in March 2020, P.L. 116-131, sections 601-644 require the Department to promote the delivery of supportive services, including nutrition services to American Indians, Alaskan Natives, and Native Hawaiians.

The Administration for Community Living (ACL) is responsible for administering the Title VI A/B (Nutrition and Supportive Service) and C (Caregiver) grants. As prescribed by the Older Americans Act Section 612, 614 and 45 CFR 1322.19 related to the eligibility of Federally recognized Tribes and Native Hawaiian organizations for grant funds under this program and their capacity to deliver services to elders.

The Application for Older Americans Act, Title VI A/B and C Grants collects information on the ability of Federally recognized American Indian, Alaskan Native and Native Hawaiian organizations to provide nutrition, supportive, and caregiver services to elders within their service area.

2. Purpose and Use of Information Collection

ACL is responsible for administering the Title VI A/B (Nutrition and Supportive Service) and C (Caregiver) grants. The purpose of this data collection is to improve and standardize the format of the application. The Application for Older Americans Act, Title VI A/B and C Grants collects information on the ability of Federally recognized American Indian, Alaskan Native and Native Hawaiian organizations to provide nutrition, supportive, and caregiver services to elders within their service area. Applicants are required to provide a description of their organization's service area, the number of eligible elders in their service area, and their ability to deliver services and sign assurances that the organization will comply with all applicable laws and regulations.

This IC is updated to better align with the requirements of the Older Americans Act and Federal regulations, as well as to improve data quality and grantee accountability. The grant application serves as the collection activity for grantees to meet funding recipient requirements and includes the data required by the OAA to provide Title VI funding to programs. The application provides summary information on services for seniors and family caregivers provided or managed by American Indian, Alaskan Native, and Native Hawaiian organizations. Data is submitted every three years by prospective Title VI grantees. It includes information on the number of people the program intends to serve, the needs of the elders the program intends to serve and how the program intends to meet those needs.

Furthermore, this grantee application better aligns with the Title VI Program Performance Report under OMB 0985-0059 and eliminates duplicate reporting requirements for grantees. This data collection also supports ACL in tracking performance outcomes and efficiency measures with respect to the annual and long-term performance targets established in compliance with the Government Performance Results Modernization Act (GPRMA).

3. Use of Improved Information Technology and Burden Reduction

The application is available in electronic form on www.grants.gov.

4. Efforts to Identify Duplication and Use of Similar Information

No other sources collect this specific data or similar information that could be used for this purpose.

5. Impact on Small Businesses or Other Small Entities

Reporting is performed by Title VI grantees (tribes, tribal consortia, and other Native organizations). No small businesses or other small entities will be involved in this information collection.

6. Consequences of Collecting the Information Less Frequent Collection

Applicants submit only one application for each funding opportunity.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

- **Requiring respondents to report information to the agency more often than quarterly;**

Not applicable. Applications are only required every three years.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Not applicable.

- **Requiring respondents to submit more than an original and two copies of any document;**

Not applicable.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**

Not applicable.

- **In connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;**

Not applicable.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Not applicable.

- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

Not applicable.

- **Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Not applicable.

8. Comments in Response to the Federal Register Notice/Outside Consultation

A 60-day Federal Register Notice was published in the *Federal Register / Vol. 87, No. 126 / Friday, July 1, 2022*. ACL received no public comments about the Title VI grant application during the 60-day public comment period. A 30-day Federal Register Notice published in the *Federal Register Vol. 87, No. 188 / Thursday, September 29, 2022*.

9. Explanation of any Payment/Gift to Respondents

Not applicable.

10. Assurance of Confidentiality Provided to Respondents

No personally identifiable information is requested or accepted from applicants; there are no assurances of confidentiality.

11. Justification for Sensitive Questions

No information of a sensitive nature is being asked or collected.

12. Estimates of Annualized Burden Hours (Total Hours & Wages)

Title VI grant applications are required once every three (3) years, so an annual response is not required for this instrument (the annual burden below reflects this calculation).

ACL estimates the burden associated with this collection of information as follows:

Respondent/Data Collection Activity	Number of Respondents	Responses Per Respondent	Hours Per Response	Annual Burden Hours
Title VI Application Parts A/B and C	545	1	4.25	395.4

The number of burden hours associated with the Title VI Part A/B and C application was previously separated. However, this clearance combines the collection activity into one for a program change of Part A/B plus the total hours previously associated with the Title VI, Part C. This resulted in an annualized number of 395.4 hours.

13. Estimates of other Total Annual Cost Burden to Respondents or Record-keepers/ Capital Costs

There are no additional costs to the projects beyond those already identified in Item 12 above.

14. Annualized Cost to Federal Government

The total Federal burden hours for two staff spent reviewing and approving applications are estimated to be 200 hours annually each. The average salary rate of a GS-13 is \$51.18 per hour¹ for a total of \$10,236. Factoring in 100% to account for benefits and overhead; the total estimated annualized cost for a GS-13 totals \$20,472.

The average salary rate of a GS-12 is \$43.04 per hour for a total of \$8,608. Factoring in 100% to account for benefits and overhead; the total estimated annualized cost for a GS-12 totals \$17,216. The total estimated annualized cost to the Federal Government is \$ 37,688.

Staff Hours/Costs

Grade 13: 200 hrs. X \$102.36 per hour	\$ 20,472
Grade 12: 200 hrs. X \$86.08 per hour	\$ <u>17,216</u>
Total Cost to Federal Government	\$ 37,688

15. Explanation for Program Changes or Adjustments

This IC does not report a change in burden; however, the application (IC activity) was previously divided into two instruments for Parts A/B and C. This submission combines the activity into one application which contains Parts A/B/C.

16. Plans for Tabulation and Publication and Project Time Schedule

No tabulation or publication is planned.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

We are not seeking approval to not display the expiration date for OMB approval of the information collected.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to this request for certification.

¹ Federal staff costs based on 2022 hourly wage rate of \$51.18 for a Project Officer at the GS 13 level and \$43.04 for a Project Officer at the GS 12 level. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/22Tables/html/DCB_h.aspx Accessed August 2022.

Supporting Statement Part B.
Collection of Information Employing Statistical Methods.

This information collection does not employ statistical methods.